

DIVORCE DECREE

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The State of Alabama, Baldwin County

Circuit Court, In Equity

EUNIA V. ROWELL LOWERY

, Complainant

vs.

RANKIN J. LOWERY

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ on Answer and Waiver and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for in said bill.

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby, dissolved, and that the said Eunia V. Rowell Lowery is forever divorced from the said Rankin J. Lowery for and on account of Cruelty.

IT IS FURTHER ORDERED ADJUDGED AND DECREED by the Court that the Complainant be and she is hereby given the right to resume her maiden name, Eunia V. Rowell.

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Rankin J. Lowery the Respondent pay the cost herein to be taxed, for which execution may issue.

This 3rd day of July, 1951

Jelfair J. Madbooney Jr.  
Judge Circuit Court, In Equity.

I, Alice J. Duck Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the \_\_\_\_\_ day of \_\_\_\_\_, 1951.

Register of Circuit Court, In Equity.

No. 2676 Page \_\_\_\_\_

The State of Alabama  
BALDWIN COUNTY

In Circuit Court, In Equity

BUNIA V. ROWELL LOWERY

Complainant

vs.

RAHKE J. LOWERY

Respondent

**DIVORCE DECREE**

**FILED**

**JUL 3 1951**

**ALICE J. BUCK, Register**

**THE STATE OF ALABAMA**  
Baldwin County.Circuit Court of Baldwin County, Alabama  
(In Equity)EUNIA V. ROWELL LOWERY

Complainant

VS.

RANKIN J. LOWERY

Respondent

I, Lois Paul

as Register and Commissioner

have called and caused to come before me Eunia V. Rowell Lowery and Naomie Rowell.

witnesses named in the Requirement for Oral Examination, on the 23 day of June 1951, at the office of C. LeNoir Thompson in Bay Minette, Alabama, and having first sworn said Witnesses to speak the truth, the whole truth, and nothing but the truth, the said Eunia V. Rowell Lowery and Naomie Rowell doth depose and say as follows:

That my name is Eunia V. Lowery. Both the Complainant and Respondent are over the age of eighteen and both are bona fide residents of Baldwin County Alabama. We were married December 30, 1950 in Lucedale, Mississippi and separated on March 15, 1951. We have not lived together as husband and wife since that date. There are no children as fruits of this marriage and no property to be divided. I do not want alimony. I know that we could never live together again because of the way he treated me before our separation. I ask the court to allow me to use my maiden name, Eunia V. Rowell.

He was so brutal to me that when he came home I feared for my life and health, because he drank so regularly, that while he was drinking he was rough in handling me, twisting my arms or striking me about the face and neck to make me respond, even when I was ill. My arms would be sore for days, after his rough treatment.

Eunia V. Lowery

That my name is Naomie Rowell. I am a citizen of Baldwin County, Alabama and over the age of 21. I know both parties to this cause. I know they were married in December, 1950 in Lucedale, Mississippi and lived together as husband and wife until March, 1951, at which time they separated through no fault of the complainant, Eunia V. Lowery. The primary cause of the separation was, the cruelty of the Respondent to the Complainant. So far as I know, she gave him no cause for the separation. They have no children and no property to be divided.

Naomie Rowell

NO. 2676 PAGE \_\_\_\_\_

THE STATE OF ALABAMA

BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

EUNIA V. ROWELL LOWERY

vs. Complainant

RANKIN J. LOWERY

Respondent.

## Oral Deposition

Filed \_\_\_\_\_, 194\_\_\_\_\_

Register.

**FILED**

Recorded in  
JUN 26 1951

Record

Vol. \_\_\_\_\_

**ALICE I. DUCK, Register**

Page \_\_\_\_\_

Register.

**ORAL EXAMINATION.**

I, Lois Paul, as Register and Commissioner hereby certify that the foregoing depositions on Oral Examination was taken down by me in writing in the words of the witnesses and read over to them and they signed the same in the presence of myself and Reuben F. McKinley.

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witnesses or had proom made before me of the identity of said witnesses; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 23 day of June, 1941

Lois Paul (L. S.)

m

No. 2676

**THE STATE OF ALABAMA**  
**Baldwin County**

**IN EQUITY**  
**Circuit Court of Baldwin County**

EULIA V. ROWELL LOWERY

vs.

RANKIN J. LOWERY

**NOTE OF TESTIMONY**

Filed in Open Court this

day of

**FILED**  
**JUN 26 1957**  
**ALICE J. DICK**  
**Register.**

Printed by The Baldwin Times Bay Minette.

EUNIA V. ROWELL LOWERY

vs.

RANKIN J. LOWERY

THE STATE OF ALABAMA  
Baldwin County

IN EQUITY  
Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, \_\_\_\_\_  
Testimony of Eunia V. Rowell Lowery and Naomie Rowell.

and in behalf of Defendant upon Answer and Waiver.

*W. J. Wrench*  
Register.

*C. E. Harris Thompson*

EUNIA V. ROWELL LOWERY

COMPLAINANT

VS

RANKIN J. LOWERY

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

Now comes the Respondent and accepts service of the summons and complaint in this cause.

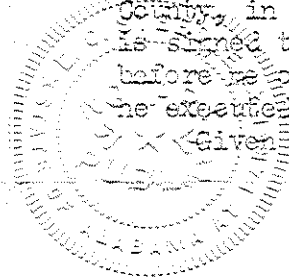
The Respondent admits the allegations as to ages, marriage and residence, but denies all other allegations contained in the bill of complaint, and demand strict proof of the same.

The Respondent waives notice of the time of taking of testimony on behalf of the Complainant; the right to cross-examine Complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

Rankin J. Lowery

STATE OF ALABAMA  
BALDWIN COUNTY

I, EC Shedd, a Notary Public, in and for said County, in said State, hereby certify that Rankin J. Lowery, whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day that, being informed of the contents of the conveyance, he executed the same voluntarily on the day the same bears date.  
Given under my hand and seal on this the 23 day of June, 1951.



EC Shedd  
Notary Public, Baldwin County, Alabama.



STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons RANKIN J. LOWERY to appear and plead, answer or demur within thirty days from the service hereof, to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by EUNIA V. ROWELL LOWERY as Complainant and against RANKIN J. LOWERY as Respondent.

WITNESS my hand this the \_\_\_\_ day of \_\_\_\_, 1951.

\_\_\_\_\_  
Register.

EUNIA V. ROWELL LOWERY  
COMPLAINANT  
VS  
RANKIN J. LOWERY  
RESPONDENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
IN EQUITY.

TO HONORABLE TELFAIR J. MASHEURN, JR., JUDGE OF THE CIRCUIT COURT  
OF BALDWIN COUNTY, ALABAMA:

Your Complainant, Eunia V. Rowell Lowery, respectfully represents  
unto your Honor and this Honorable Court as follows:

1.

That your Complainant is a bona fide resident of Baldwin County, Alabama, and is over eighteen years of age; that the Respondent is a bona fide resident of Baldwin County, Alabama, and over twenty years of age.

2.

That your Complainant and the Respondent married at Lucedale, Mississippi, on December 30, 1950, and lived together as husband and wife until March 15, 1951.

3.

That on to-wit March 15, 1951, and on several occasions prior thereto the Respondent threatened and abused the Complainant and threatened to do actual violence to her persons which would necessarily endanger her life and health. The conduct of the Respondent was such as to give the Complainant every reasonable apprehension to believe and

she did actually believe that if she continued to live with him he would carry out his threats and do actual violence to her person, which would necessarily endanger her life and health.

4.

That your Complainant and the Respondent have no children as fruits of this marriage, and there is no property to be divided.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said Rankin J. Lowery party Respondent to this cause of action, requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant prays that upon a hearing hereof, Your Honor will enter an order and decree granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

  
Solicitor for the Complainant.

2676 RECORDED

EUNIA V. ROWELL LOWERY

COMPLAINANT

VS

RANKIN J. LOWERY

RESPONDENT

SUBPOENS AND COMPLAINT

FILED

JUN 26 1951

ALICE J. DYCK, Register

From the law offices of  
C. LeNoir Thompson  
Bay Minette, Alabama

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA

Baldwin County

Circuit Court

TO: Lois Paul.

KNOW YE: that we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine Eunia V. Rowell Lowery and Naomie Rowell.

as witnesses in behalf of Complainant. in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein Eunia V. Rowell Lowery.

Rankin J. Lowery., Complainant  
and

Respondent  
on oath, to be by you administered, upon Eunia V. Rowell Lowery and Naomie Rowell.  
to take and certify the depositions of the witnesses and return the same to our Court, with all  
convenient speed, under your hand.

Witness 23<sup>rd</sup> day of June, 1941

Arthur J. Lowery  
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 2676

**THE STATE OF ALABAMA**  
**Baldwin County**

**CIRCUIT COURT**

EUNIA V. ROWELL LOWERY

Complainant

**VS.**

RANKIN J. LOWERY

Defendant

**COMMISSION TO TAKE DEPOSITION**

**COMMISSIONER:**

Lois Paul

**WITNESSES:**

Eunia V. Rowell Lowery

Rankin J. Lowery

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons RANKIN J. LOWERY to appear and plead, answer or demur within thirty days from the service hereof, to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by EUNIA V. ROWELL LOWERY as Complainant and against RANKIN J. LOWERY as Respondent.

WITNESS my hand this the \_\_\_\_ day of \_\_\_\_, 1951.

Register.

EUNIA V. ROWELL LOWERY  
COMPLAINANT

VS

RANKIN J. LOWERY  
RESPONDENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
IN EQUITY.

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(500)

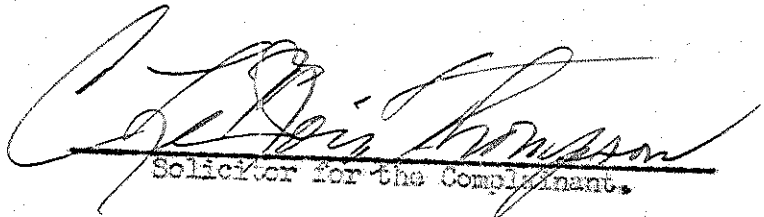
she did actually believe that if she continued to live with him he would carry out his threats and do actual violence to her person, which would necessarily endanger her life and health.

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Solicitor for the Complainant.

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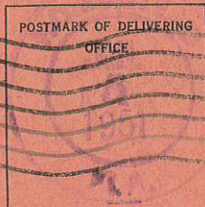
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(NAME OF SENDER)

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Post Office

INSURED PARCEL

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State

*Ala*

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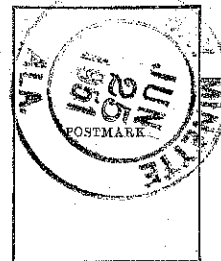
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in person

or order

Fee paid



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Alice Smith

(Street and number)

Addressed to

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Postmaster, per